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15 *Attorneys for Plaintiffs and the Proposed Class*

16
UNITED STATES DISTRICT COURT
 17
NORTHERN DISTRICT OF CALIFORNIA
 18

19 NEETA THAKUR, *et al.*,
 20 Plaintiffs,

21 Plaintiffs,

22 v.

23 DONALD J. TRUMP, *et al.*,

24 Defendants.

Case No. 3:25-cv-4737

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**DECLARATION OF ELIZABETH J.
 CABRASER IN SUPPORT OF
 MOTION FOR PRELIMINARY
 INJUNCTION AND PROVISIONAL
 CLASS CERTIFICATION AS TO THE
 DEPARTMENT OF HEALTH AND
 HUMAN SERVICES / NATIONAL
 INSTITUTES OF HEALTH**

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2 I, Elizabeth J. Cabraser, declare as follows:

3 1. I am an attorney admitted to practice in the state of California. I am a partner of
4 Lieff Cabraser Heimann & Bernstein LLP (“LCHB”). I respectfully submit this declaration in
5 support of Plaintiffs’ Motion For Preliminary Injunction And Provisional Class Certification As
6 To Department of Health and Human Services / National Institutes of Health. I have personal
7 knowledge of the facts set forth in this declaration, and could testify competently to them if called
8 upon to do so.

9 2. Attached as **Exhibit A** is a true and correct copy of the July 31, 2025 “Notice of
10 Award Suspension” letter sent from NIH Acting Deputy Director for Extramural Research, Jon
11 Lorsch, to University of California Los Angeles Chancellor, Dr. Julio Frenk.

12 3. Attached as **Exhibit B** is a true and correct copy of an exemplar individual NIH
13 grant termination letter that Defendants produced to Plaintiffs on June 17, 2025.

14 I declare under penalty of perjury under the laws of the State of California and the United
15 States that the foregoing is true and correct.

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17 Executed this 29th day of August, 2025, in San Francisco.

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/s/Elizabeth Cabraser

Elizabeth Cabraser

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